

1 Blake L. Harrop
2 Chadwick O. Brooker
3 Antitrust Bureau
4 Office of the Illinois Attorney General
5 100 W. Randolph Street
6 Chicago, Illinois 60601
7 (312) 814-1004 (phone)
8 (312) 793-3891 (phone)
9 (312) 814-4209 (fax)
10 bharrop@atg.state.il.us
11 cbrooker@atg.state.il.us

12 *Counsel for the State of Illinois*

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 IN RE CATHODE RAY
18 TUBE (CRT) ANTITRUST
19 LITIGATION

20 No. CV-07-5944-JST
21 MDL No. 1917

22 **Brooker Declaration in Support of**
23 **the State of Illinois' Motion to**
24 **Intervene for Limited Purposes**

25 Date: November 17, 2016

26 Time: 2:00 pm

1 Court: Courtroom 9, 19th Floor, 450
2 Golden Gate Ave., San Francisco, CA

3 Judge: Hon. Jon S. Tigar

4 This Document Relates To:

5 All Actions

6 I, Chadwick O. Brooker, declare:

7 1. I am an Assistant Attorney General for the Office of the Illinois Attorney
8 General. I have personal knowledge of the matters stated in this declaration and
9 would provide competent testimony if called upon to do so.

2. I make this declaration in support of the State of Illinois' Motion for Intervention for Limited Purposes.

3. Exhibit A is the proposed State of Illinois' Motion to Clarify Settlement-Approval Order (without exhibits), which the State would file if granted leave to intervene.

4. Exhibit B is the proposed State of Illinois' Motion to File Documents on the Public Record (without exhibits), which the State would file if granted leave to intervene.

5. Exhibit C is a true and correct copy of the State's Amended Complaint in *State of Illinois v. Hitachi, Ltd.*, No. 12-CH-35266 (Cir. Ct., Cook Cnty., filed May 17, 2013).

6. Exhibit D is a true and correct copy of Defendant LGE's Eighth Affirmative Defense, June 3, 2016.

7. Exhibit E is a true and correct copy of LGE USA's Tenth Affirmative Defense, June 3, 2016

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Dated: October 7, 2016

Respectfully submitted,

LISA MADIGAN,
Attorney General of Illinois

By: /s/ Chadwick O. Brooker
Chadwick O. Brooker
Assistant Attorney General
Antitrust Bureau
Office of the Illinois Attorney General
100 W. Randolph Street
Chicago, Illinois 60601
(312) 793-3891
cbrooker@atg.state.il.us